

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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LA TASHIA GAYLE,

Plaintiff,

-against-

CHILDREN'S AID COLLEGE PREP CHARTER SCHOOL,  
CHILDREN'S AID OF NEW YORK, CASEY VIER, *In Her  
Individual and Official Capacities*, and DEVON JACKSON,  
*In His Individual and Official Capacities*.

Defendants.  
-----X

Civil Action No.:  
18-CV-09874 (GBD)

**DECLARATION  
IN SUPPORT**

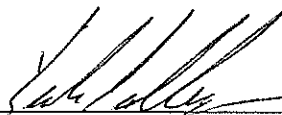
**YALE POLLACK**, declares under the penalty of perjury, pursuant to 28 U.S.C. §1746:

1. I am the principal of the Law Offices of Yale Pollack, P.C., attorneys for Defendant Devon Jackson ("Jackson").

2. I respectfully submit this Declaration in support of Jackson's motion, pursuant to Fed. R. Civ. P. 12(b)(6), to dismiss the Sixth and Seventh Causes of Action asserted against him in Plaintiff La Tashia Gayle's ("Plaintiff") Amended Complaint. *A copy of Plaintiff's Amended Complaint is annexed hereto as Exhibit "A."*

3. As set forth in the accompanying Memorandum of Law, as well as for all reasons as stated in Defendant Casey Vier's motion to dismiss, Jackson respectfully submits that the Sixth and Seventh Causes of Action asserted in the Amended Complaint should be dismissed against him based on their failure to state a claim, together with an award of such other and further relief as the Court deems just and proper.

Dated: April 1, 2019  
Syosset, New York

  
YALE POLLACK